

EXHIBIT A

Gabe Cohan

From: Sampson, Colin (USACAN) [Colin.Sampson@usdoj.gov]
Sent: Tuesday, May 10, 2016 9:17 AM
To: 'Bill Allan Cohan'; Gabe Cohan
Cc: Kluge, Matthew J. (TAX)
Subject: United States v. Richard Grant
Attachments: Eric Chan US v GRANT Woods Rebuttal DRAFT 5 6 2016 (2).pdf; Response to DOJ questions re Woods evaluation.pdf; paul garcia cv 2016.pdf

Mr. Cohan,

Please find attached two reports from experts retained by the government in this matter. With respect to Dr. Garcia, we are also including his CV (we have previously produced Dr. Chan's CV). These reports, or declarations based thereon, will support the government's forthcoming Daubert motion.

Respectfully,

Colin C. Sampson
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EXHIBIT B

Gabe Cohan

From: Gabe Cohan [gabriel@burnsandcohan.com]
Sent: Monday, May 2, 2016 7:14 AM
To: 'Sampson, Colin (USACAN)'; 'William A. Cohan'; 'Bill Allan Cohan'
Cc: 'Kluge, Matthew J. (TAX)'
Subject: RE: Dr. Woods

Colin,

I suggest you set the hearing TBD for at least a few reasons. First, we cannot control Dr. Woods' schedule and he has already indicated he cannot be available on May 18. Second, since you recently notified the defense of your intention to seek a *Daubert* evidentiary hearing, we have worked in good faith to find dates when Dr. Woods is available. Third, the government has had the expert reports for months and only recently has decided to request a *Daubert* hearing, apparently now seeking to exclude some or all of Dr. Woods' proposed testimony. Fourth, it is unclear that setting the *Daubert* hearing for a date when Dr. Woods is available will "put the trial date in jeopardy," but it is the government bringing this motion at the Eleventh hour and seeking to do so in a manner inconsistent with the judge's pretrial order and Dr. Woods' schedule that has created this problem.

Respectfully,

Gabe

From: Sampson, Colin (USACAN) [mailto:Colin.Sampson@usdoj.gov]
Sent: Sunday, May 1, 2016 12:03 PM
To: Gabe Cohan; 'William A. Cohan'; 'Bill Allan Cohan'
Cc: Kluge, Matthew J. (TAX)
Subject: RE: Dr. Woods

Mr. Cohan,

The dates you provided are beyond the pretrial conference and put the trial date in jeopardy. We will be noticing the hearing for May 18 and noting your objection and our efforts to accommodate Dr. Woods' schedule.

Colin Sampson

From: Gabe Cohan [mailto:gabriel@burnsandcohan.com]
Sent: Sunday, May 01, 2016 8:15 AM
To: Sampson, Colin (USACAN); 'William A. Cohan'; 'Bill Allan Cohan'
Subject: Dr. Woods

Colin,

Dr. Woods advises that he can be available on May 27, 30 and/or June 6.

Regards,

Gabe